

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

Seira DeVeau §
Plaintiff, §
§
v. § CIVIL ACTION NO. 3:21-cv-00261
§
Arnold Dotson, et al. §
Defendant. §

PARTIES AGREED MOTION TO REMAND

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff SEIRA DEVEAU and Defendants LANDSTAR RANGER, INC. and ARNOLD DOTSON file this agreed motion to remand this cause to the 253rd Judicial District Court of Chambers County, Texas, where this cause was originally and properly filed, pursuant to 28 U.S.C.A. § 1447(c).

I. Case Background

Plaintiff filed this lawsuit on August 16, 2021, alleging causes of action against Defendants arising out of a motor vehicle collision in Chambers County, Texas.

Defendants filed a Notice of Removal [Doc. # 1] on September 23, 2021 based upon diversity of citizenship.

II. The Parties Now Agree There is Not Complete Diversity of Citizenship

After the notice of removal was filed, counsel for the parties discussed the removal, and the parties now agree that removal of this cause was improper because there is not complete diversity of citizenship. Specifically, Plaintiff SEIRA DEVEAU has her domicile in the State of Florida, and is therefore a citizen of Florida for diversity purposes. Defendant LANDSTAR RANGER,

INC. has its principal place of business in the State of Florida, and is therefore a citizen of the Florida for diversity purposes. Accordingly, there is not complete diversity of citizenship.

Therefore, the parties respectfully requests that this Court remand this cause to the 253rd Judicial District Court of Chambers County, Texas.

Respectfully submitted,

The Linebaugh Law Firm, P.C.

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CERTIFICATE OF CONFERENCE

I certify that I have spoken with counsel for Arnold Dotson and Landstar Ranger, Inc. regarding the subject-matter of this Motion, and counsel agrees to the relief sought by this Motion.

/s/ Timothy R. Allen
Timothy R. Allen

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Motion to Remand has been forwarded to all counsel of record by the Court's CM/ECF system on this 12th day of October, 2021.

/s/ Timothy R. Allen
Timothy R. Allen